

SWORN AFFIDAVIT

1

Collin Armand Martin ID number 8205065266087 states under oath in English. I make this statement in terms of section 212 (4) of Criminal Procedures Act 51 of 1977.

2

I am a 41-year-old male working as a specialist veterinary pathologist for Idexx South Africa, where I have been employed since 2014.

3

I qualified as a veterinarian in 2008 at Onderstepoort Faculty of Veterinary Science. I am currently registered as a specialist anatomical veterinary pathologist with the South African Veterinary Council and my registration number is S020/06090. I worked as a veterinarian from 2009 to 2014 as a small animal clinician at Blue Hills Veterinary Clinic in Kyalami. I left Blue Hills to pursue an anatomical pathology residency with Idexx at Onderstepoort in 2014 and was trained by Dr. Liza Du Plessis, Dr. Sarah Clift amongst others at the faculty. I qualified with an MMedVet (Pathology) in 2020. I am currently a specialist veterinary pathologist for Idexx South Africa.

4

Due to unavailability of state post-mortem services, I was contacted by Nicole Venter (an Inspector for the SPCA Cape of Good Hope) on Friday the 15th of March 2024 and asked if I could assist with a post-mortem on a suspected cruelty case. History is apparent deliberate strangulation. There is allegedly already a case opened at Strand SAPS against the man which strangled the dog, CAS 328/03/2024.

5

I performed the post-mortem at the hospital section of the SPCA Cape of Good Hope on the morning of the 16th of March 2024 and made the following observations with Nicole Venter in attendance. The carcass was in a black bag labelled with admission number A31015.

The carcass was that of an adult, sterilised female, tan and black, medium sized mixed breed in good body condition (4/5). There was moderate autolytic change due to poor refrigeration of the carcass on Friday, which will obscure some pathology. External examination further revealed mildly congested oral and conjunctival mucous membranes.

During removal of the skin, there are multifocal, roughly 3-5cm, irregular, well demarcated areas of dark discolouration (consistent with haemorrhage/bruising) along the mid to cranial portion of the neck. Lesions were most severe ventrally around the pharynx and thyroid regions (please see photos 1 and 2).



Figure 1 - Subcutaneous bruising around cranial neck.

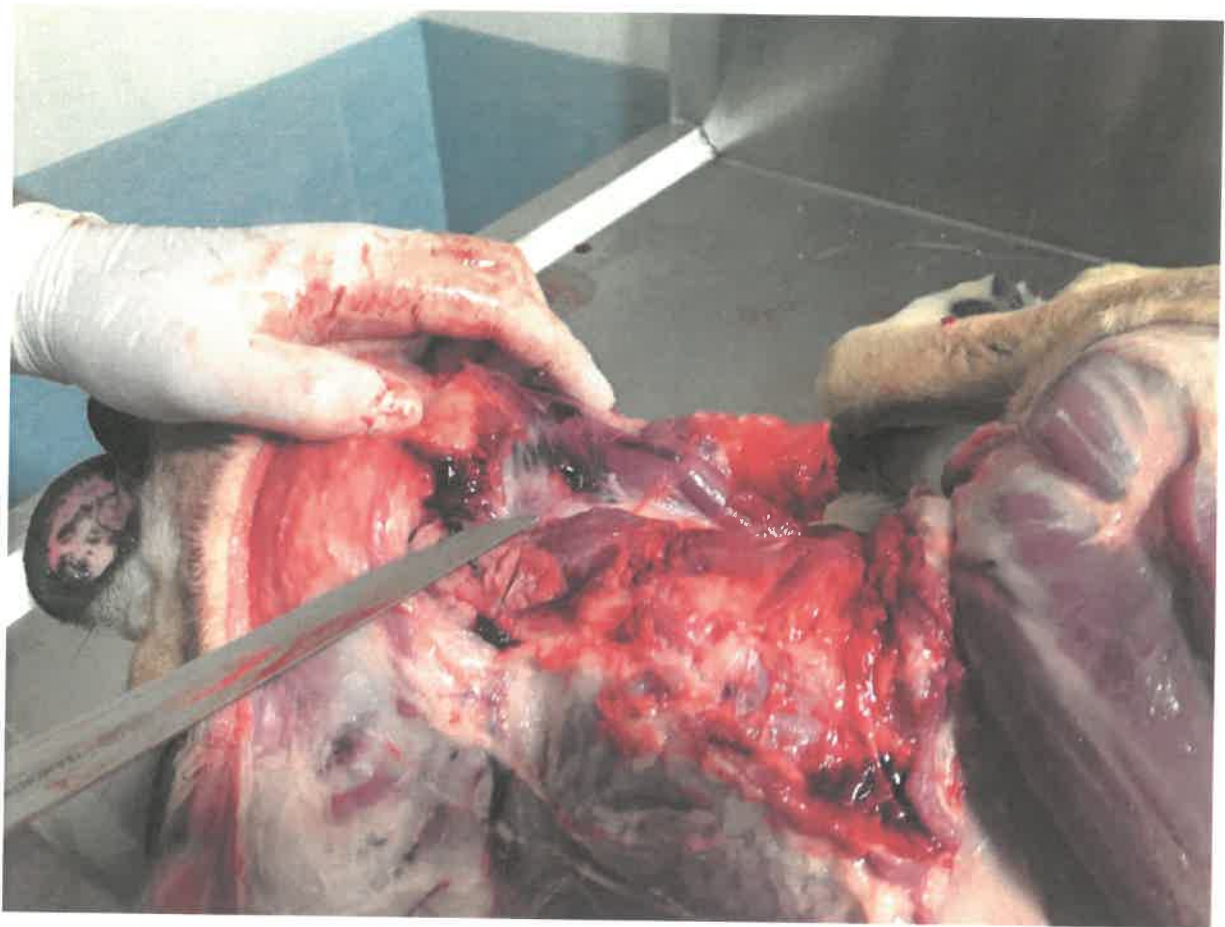


Figure 2 - More severe lesions on ventro-cranial neck.

The trachea and pharynx are still intact, but the mucosa is discoloured red due to postmortem haemoglobin imbibition.

The lungs are dark red, heavy and show oozing serosanguinous fluid on cut surface consistent with moderate pulmonary oedema.

All of the intra-abdominal organs show moderate to severe postmortem putrefaction and haemoglobin imbibition. The stomach only contains water. The intestine was empty. No other significant abnormalities were found.

6

Histological specimens of all organs and affected subcutaneous regions were preserved in formalin.

7

The pattern of circumferential bruising around the cranial neck with more severe lesions ventrally is entirely consistent with strangulation. Other changes to support

this would include mucous membrane congestion (due to partial obstruction of jugular veins) as well as pulmonary oedema. Strangulation, especially if done deliberately, is a cruel and painful method of death. Please correlate these observations with appropriate history in this case.

8

I know and understand the contents of this statement.

I have no objection to taking the prescribed oath.

I see the prescribed oath as binding on my conscience.

Collin Mark Cotton

DEPONENT

The deponent has acknowledged that he knows and understands the contents of this affidavit/declaration, which was signed and sworn to before me at Cape Town on this the 28th day of March ²⁴ 2022, the N.A. regulations contained in Government Notice No R1258 of 21 July 1972, as amended, and Government Notice No R1648 of 19 August 1977, as amended, having been complied with.



COMMISSIONER OF OATHS

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Designation: _____
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